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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 29, 1994

EX PARTE OR LATE FILED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

RE: Late-Filed Submission, Children's Television
Proceeding, MM Docket No. 93-48

Dear Mr. Caton:

The Association of America's Public Television Stations ("APTS") hereby requests acceptance of the attached document as late-filed comments in the record of the FCC's children's television proceeding, MM Docket No. 93-48, in connection with the en banc hearing held by the FCC on children's television on June 28, 1994. Written comments were accepted by the FCC in this matter on June 8, 1994.

APTS is submitting the Forum Report of The National Ready To Learn Television Forum, held on May 17 and 18, 1994. The National Ready To Learn Television Forum ("RTL Forum") was sponsored by APTS and the Carnegie Foundation for the Advancement of Teaching. The Forum convened approximately 100 of the nation's leaders from the broadcasting and cable fields, education and community-based organizations, federal agencies, and the Congress, in order to design a decade-long practical strategy for making television an indispensable contributor to the educational enrichment of preschool children.

The attached Forum Report summarizes the findings, goals and strategies developed in the RTL Forum, which APTS believes would be a valuable contribution to the Commission's record in the children's television

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proceeding. APTS was unable to file in a timely fashion because the Forum Report was not completed by the comment deadline. APTS, therefore, requests acceptance of the Forum Report as late-filed comments in MM Docket No. 93-48, in connection with the public comments recently accepted by the FCC in response to its Public Notice on the children's television hearing.

An original and nine copies of the Forum Report are included herewith. Should any questions arise concerning this submission, please contact the APTS office.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lonna M. Thompson", written over a horizontal line.

Marilyn Mohrman-Gillis
General Counsel
Lonna M. Thompson
America's Public Television Stations

Enclosures


cc (w/ enc.): Larry A. Miller, Video Services Division, FCC



THE NATIONAL READY TO LEARN TELEVISION FORUM

SPONSORED BY

The Association of
America's Public
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and the Carnegie
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with major funding
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MAY 17 & 18, 1994

WASHINGTON, DC

FORUM REPORT

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THE FORUM WAS MADE POSSIBLE BY GRANTS FROM:

CORPORATION FOR PUBLIC BROADCASTING
THE PEW CHARITABLE TRUSTS
AT&T FOUNDATION

WITH A SPECIAL THANK-YOU TO DAVID KLEEMAN,
DIRECTOR, AMERICAN CENTER FOR CHILDREN'S TELEVISION,
FOR COMPILING THIS REPORT ON THE WORK OF THE FORUM

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HE NATIONAL READY TO LEARN TELEVISION FORUM

"Addressing the needs of children may be the greatest challenge our country faces; how we meet that challenge will determine what our nation will become."

— U.S. Senator Edward Kennedy

"No one-shot answer will do the job of assuring that children in the first few years of life will, when they go to school, be ready to learn. There is a role here for every participant—for the schools; for government, at all levels; for the television networks, cable and the new technologies; for business and industry. Above all, for America's future, America's parents must invest themselves in the lives of their children."

— Dr. John Brademas, President Emeritus, New York University

"The first educational goal is, of course, an audacious, hugely optimistic proposition. Yet, dreams can be fulfilled only when they've been defined, and if "ready to learn" would become a central mandate for this country; if we, as a

nation, would prepare every child effectively for school, then I'm convinced that all the other educational goals would, in large measure, be fulfilled. And, in that spirit, could we agree, at the very outset... that in pursuing the nation's first education goal, television does, indeed, have a critically important role to play? And could we also agree that it's time for all members of the industry to develop, collaboratively, a coherent children's television plan to assure that all preschoolers are well prepared for learning and for life?"

— Dr. Ernest Boyer, President, Carnegie Foundation for the Advancement of Teaching

"Ready to learn television must lift children to the highest accomplishment of the spirit, as well as the mind... If we don't turn them on, they will turn us off."

— Shari Lewis

BY THE YEAR 2000, ALL CHILDREN IN AMERICA WILL START SCHOOL READY TO LEARN.

The National Ready to Learn Television Forum was inspired by this, the first of the nation's education goals, and by Dr. Ernest L. Boyer's 1991 book, *Ready to Learn: A Mandate for the Nation*, a detailed and practical blueprint for policy makers and educators to use in achieving this goal.

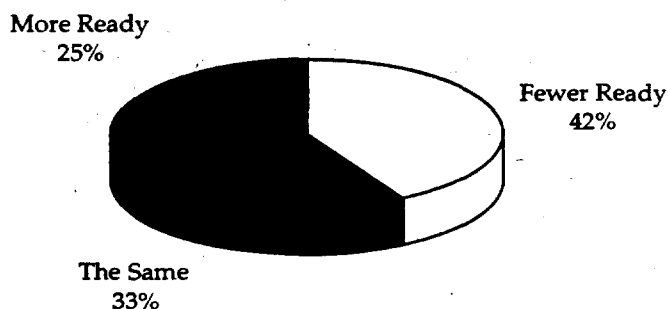
The challenges are great. In a 1991 survey, conducted in preparation for Dr. Boyer's book, kindergarten teachers said that 35 percent of their pupils are not prepared for school in at least one key dimension.

Moreover, when asked to compare the readiness of today's students with those of five years ago, 42 percent said the situation is becoming worse.

A broad range of resources must be brought to bear on improving early education, and television is an indispensable component. As Dr. Boyer stated, in opening the National Ready to Learn Television Forum, "After parents, television is, in fact, a child's most compelling, most influential teacher—one that can either profoundly enrich or dramatically diminish the quality of their lives and, ultimately, their capacity to learn."

This statement captures our nation's ambivalence toward television and children. Some see the medium as destructive to learning; others celebrate television's potential for educating as it entertains. Whether one sees it as a blessing or a curse, however, television is a reality in children's lives. They will watch, and they will learn from every program they see. As Dr. John Brademas noted in his address to the forum, "So pervasive and powerful is the medium of television... in the lives of children that we must consider how effectively to harness its capacity."

How Does the Readiness of Your Students Today Compare to Five Years Ago?



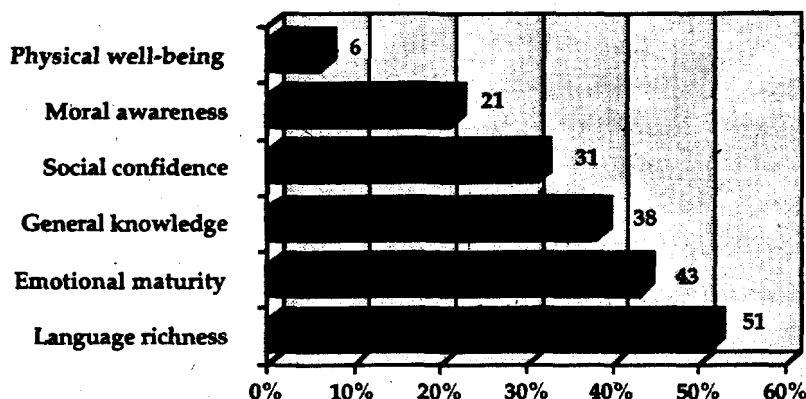
SOURCE: The Carnegie Foundation for the Advancement of Teaching, National Survey of Kindergarten Teachers, 1991.

The above-mentioned teacher survey also asked the dimensions of readiness in which teachers most often found serious problems.

Harnessing television's potential demands partnership with the producers and executives responsible for children's programming. They represent a huge reservoir of

creative talent, with a proven ability to combine fun and learning. These people are the medium's "teachers," and we cannot afford not to tap their commitment and expertise. Parents, educators, researchers and child development specialists also must be involved, so that television will reflect our best knowledge about how young people grow and learn.

Teachers Reporting "Serious Problems" in Six Dimensions of Readiness



SOURCE: The Carnegie Foundation for the Advancement of Teaching, National Survey of Kindergarten Teachers, 1991.

Language development, emotional and social confidence, and general knowledge about the world headed the list. It is in these areas that children's television has been most demonstrably effective as a partner in early education, through such programs as *Sesame Street*, *Mister Rogers' Neighborhood*, *Eureka's Castle*, *Captain Kangaroo*, *Romper Room* and others.

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MISSION AND GOALS

MISSION

To design a decade-long practical strategy for making television an indispensable contributor to the educational enrichment of preschool children.

GOALS

To develop strategies to ensure that television programs for children aged 0-6, their parents and caregivers, are of the highest quality.

To define incentives, both financial and regulatory, that must be in place to promote the development of television programs which will help to prepare young children to enter school in the 21st century ready to learn.

To define technology and distribution systems that must be in place to make high-quality children's programming universally available.

STATEMENT OF PRINCIPLES

In framing plans to fulfill these goals, The National Ready to Learn Television Forum must cast its vision beyond broadcast television and into other technologies; involve the full range of video providers, not just public broadcasters; and seek public and private solutions for funding, distribution and outreach.

DEFINING SCHOOL READINESS

Children's diverse learning styles, varying rates of development and cultural differences affect whether a child enters school equipped to succeed. From conception to age six, a child's physical, social, emotional and intellectual development is influenced by many forces, among them family, neighbors, other children, caregivers, health care providers, and television. The strength of these links profoundly affects a child's capacity for, and attitude toward, learning.

The National Education Goals Panel chose, therefore, to define readiness in terms of five broad dimensions. Within these areas, assessment measures can be developed that allow for individual differences:

Good Health—Prevention, nutrition and motor development are key factors in physical well-being. Because healthy development begins before birth, good prenatal care and parenting training are vital.

Emotional and Social Well-Being—The child must be secure in relationships, with the self-confidence necessary to explore new situations. These capacities begin from birth with stable and loving relationships with adults.

Approaches to Learning—From very early, individuals have different ways of learning; this natural diversity is to be encouraged. Some factors that are seen to help children in school are curiosity, independence, persistence, and pride.

Language Development—Success in the classroom depends on the ability to express ideas clearly and to comprehend others' thoughts, and on an appreciation and enjoyment of written and oral communication.

General Knowledge—Children whose early years are rich in exploration and play will have the advantage of information that they take in about the world.

Dr. Boyer, in opening the Forum, proposed an additional dimension:

Values—In order to be part of the school community, the child must have self-discipline, self-esteem, honesty, diligence and compassion.

IMMEDIATE ACTION PLANS

The mission of the National Ready to Learn Television Forum was to design a decade-long practical strategy for making television an indispensable contributor to the educational enrichment of preschool children. The forum proposes the following actionable plans to advance the identified goals.

ENCOURAGEMENT AND AWARENESS GOAL

Establish a sustained, authoritative vehicle for supporting television industry efforts to weave age-appropriate learning themes and behavioral models into all types of programming.

STRATEGIES

1. An ad hoc subgroup of forum participants representing a variety of media, production and distribution perspectives met on June 13 to follow up on the deliberations at the forum, and drafted the following statement on the nature of educational programming, for submission to the Federal Communications Commission's June 28 hearing on implementation of the Children's Television Act of 1990:

While one cannot legislate quality or guarantee success, we define educational programming, for all age groups, as that which

- *is developed with a clear definition and documentation of the age-appropriate educational needs to be addressed;*

- *is designed with a distinct vision of how the program will meet those needs through its format and content; and*
- *employs educational consultation in its development and/or demonstrates its efficacy in achieving its organizing principles.*

2. A workshop will be convened in fall, 1994 in Los Angeles (to be organized by the American Center for Children's Television) to provide a practical and engaging introduction for producers and writers to the developmental needs, abilities and interests of children, ages 2-5, 6-11 and 12-16.

3. By August 1, the American Center for Children's Television (ACCT), in consultation with the Association of America's Public Television Stations, will prepare a proposal for a National Resource Center on Television and Learning, in consultation with other interested parties, such as Kidsnet.

The Resource Center would prepare and disseminate to the television industry guidelines and white papers on education and child development; provide technical and creative support through seminars, workshops and consulting; and enhance public awareness and recognition for outstanding efforts. ACCT is guided by a coalition of commercial and public telecasters and producers. The Resource Center proposal will expand that governance structure, to include other parties integral to the forum. The concept is an operational approach to the call for a national commission on ready to learn programming.

4. DIC Entertainment will create an animated character to identify ready to learn programming. Royalties from use of the character will benefit the Resource Center. The character will become part of a wide effort to develop navigational tools that can help families find ready to learn programming and services.

5. ACCT, with forum participants, will establish a "Boyer Award" for outstanding ready to learn services, as part of the Ollie Awards for Excellence in Children's Television.

6. Children First and the Corporation for Public Broadcasting will meet with interested forum participants in the fall of 1994 to outline ways in which a comprehensive and coordinated public awareness campaign could be developed with public and private partners to promote effective ready to learn television programming and services, regardless of the media on which they are available. The recommendations of this meeting will seek to expand on existing efforts in this area.

FUNDING AND INCENTIVES GOAL

Create a public and private web of direct funding and other incentives to stimulate investment in commercial and public television's educational programming for children.

STRATEGIES

7. On behalf of Forum participants, APTS will urge Congress to

- create tax incentives to encourage corporate investment in children's television programming, outreach materials and services;

- allocate additional funds for the National Endowment for Children's Educational Television (NECET), and empower the Department of Commerce to leverage these funds through its associations with American corporations;
- make a five-year commitment to ready to learn funding, of no less than \$10 million per year, to be used collaboratively by the Department of Education and the Corporation for Public Broadcasting; and
- coordinate the investment in ready to learn television programming and services that occurs in the Departments of Education and Commerce and the Corporation for Public Broadcasting.

8. Forum participants will recommend increased federal funding for public broadcasting. A letter will be drafted and circulated to all participants by APTS by August 1.

9. Forum participants will recommend to the Federal Communications Commission and Congress that profits from the upcoming auction of telecommunications spectrum space be earmarked for investment in ready to learn television programming and services, through the NECET or the Corporation for Public Broadcasting. A letter will be drafted and circulated to all participants by APTS by August 1.

TECHNOLOGY GOAL

Eliminate technical and financial barriers that inhibit the widest use of existing technologies to deliver a broad array of ready to learn programming.

STRATEGIES

10. The Public Broadcasting Service (PBS) will convene all necessary parties to identify steps that could lead to providing videocassette distribution of beneficial programming through schools, churches, libraries, community centers and video retailers at little or no cost.

11. To bolster public television stations' capacity to carry a full-day schedule of ready to learn television programming, APTS, CPB, PBS and such other partners as may be appropriate will seek: incentives to get video recording equipment into schools, enabling them to record overnight feeds of instructional television (ITV) programming (thereby freeing daytime hours for ready to learn programs); cable access for as many schools as possible, and local cable channel allocation for ITV distribution; and affordable access to new technologies for ready to learn programming.

12. PBS will identify key companies or organizations, including videogame and software companies, and seek voluntary attempts to achieve interoperability among technologies that may be used to deliver educational programming to homes and schools.

P PROGRAMMING WORKING GROUP

OBJECTIVE

To develop the most detailed description possible of programming appropriate for the very youngest audiences which entertains and advances the ready to learn goal.

enhancing effectiveness. Funders could be assured that they are supporting fully-developed components in an organized effort. Legislators would know that each participating telecaster is playing an appropriate role in TV for early learning.

BACKGROUND

Efforts to make television a full partner in preparing children for school must acknowledge what the medium does best, as well as what it cannot do. Television is not a panacea for gaps in our nation's care for young children. It can teach nutrition, but can't supply a good breakfast. TV cannot replace a nurturing parent, but it can strengthen adult caregivers' competence. It can take children across town or around the world, but can't provide a safe neighborhood.

Because children learn in different ways, a balanced variety of programs will be necessary to address each of the broad categories that are considered fundamental to school readiness: good health, emotional and social well-being, approaches to learning, language development, general knowledge, and values.

An industry-wide, comprehensive blueprint for ready to learn programming would enhance efforts in outreach, technology, incentives and regulation. Redundancy would be avoided, and programs would be distributed via the most appropriate technology. Promotion and outreach could be coordinated, saving money and

PROGRAMMING WORKING GROUP

GUIDING PRINCIPLES

Entertainment and education cannot be separated. Children learn from all television; the question is what is being taught. Television that is not entertaining will not be watched and, therefore, cannot fulfill its objective, however valuable.

Ready to learn programs must extend beyond the youngest children. Older siblings control the television in many homes with pre-schoolers, and children are known to prefer "watching up"—choosing programs for older viewers.

The creative community needs assistance in developing clear ready to learn programming guidelines, including specific and measurable outcomes desired. Practical information about children's development and learning, including creative guidance for incorporating that material into programs, should be available on an ongoing basis.

Educational programming and related outreach efforts for parents and other caregivers are crucial.

Outstanding programming or outreach efforts should be honored in a way that strengthens professionals' understanding of effective techniques, and increases public awareness of available resources.

C **OMMUNITY SERVICE AND OUTREACH WORKING GROUP**

OBJECTIVE

To recommend the most effective strategies for community outreach to engage families and care providers in utilizing educational television programming and other educational media, and to promote sound development of children and the enhancement of their readiness to learn.

BACKGROUND

Much that we know about child development and parenting demands that ready to learn television efforts reach beyond the screen, in order to be truly effective.

With the average household receiving nearly 30 television channels, parents and caregivers need help to find and to make the best use of programming that can benefit their children.

Television, at its best, engages children actively and leaves them with ideas or activities when the set is turned off. This involvement can be extended and strengthened through supplemental materials or workshops for both the caregiver and the child that offer activities and projects to reinforce the lessons taught by the program.

Television is most effective as an educator when adults mediate and interpret the programs children see. Since it's impossible for parents or caregivers always to watch along, outreach efforts can familiarize them with what their children watch.

National awareness efforts using television are best supported by local organizations equipped to provide direct, effective services to families.

Television can also give parents and caregivers focused educational programs that offer tools and encouragement for working with children on school readiness skills other than those delivered by television.

C COMMUNITY SERVICE AND OUTREACH WORKING GROUP

GUIDING PRINCIPLES

Equal to concern about children being "ready to learn" should be an effort to ensure that adults are "ready for children." Parents and caregivers must be empowered to take an active role in their children's education—even before they enter school. This includes the media literacy skills to use television wisely.

All children must be the beneficiaries of school readiness initiatives, not simply children considered to be "at risk."

While direct caregivers—parents, teachers and day care providers—have common interests in how to use television most effectively, all adults in a community share in the responsibility for children's welfare. Outreach to "children's agents"—local organizations (libraries, churches, recreation centers), family services (medical, social, educational), businesses and government—puts an entire community on the same course.

Effective outreach is built around six principles. Efforts must:

- use existing resources to best advantage to minimize the need for new bureaucracies;
 - employ clear and consistent lines of communication among partners to sustain common cause;
 - constantly be refined by listening to, and learning from, the target audience; and
 - be specific and relevant to the program content and to the community they serve.
- be sustained over a prolonged period of time; a quick campaign informs, but does not produce lasting results;
 - be integrated from the beginning, not tacked on at the end;

TECHNOLOGY WORKING GROUP

OBJECTIVES

To maximize public access to ready to learn programming within the shortest period of time.

To identify ways in which existing and emerging technologies can enhance the efficacy of ready to learn programming.

BACKGROUND

Two key questions frame discussion of the best mix of technologies for disseminating ready to learn materials: how widespread and equitable is each alternative (a consideration in reaching children with few other educational resources), and does the technology have special qualities that enhance its educational potential.

Broadcast television reaches 99 percent of U.S. households. With no charge for reception, it is the most readily accessible technology. Broadcasters serve all audiences, however, children's programming must compete for time in the schedule.

Cable is received in nearly two-thirds of U.S. households (but only two-fifths of those with income below \$15,000). Increasingly, schools and child care centers are wired for cable TV. Cable's channel capacity encourages "narrowcasting," permitting more time, or entire channels, to be devoted to children.

VCRs are found in 73 percent of homes (but only 39 percent of those with low income). Videotaped programs can be stored and replayed; repetition is an important part of early learning.

Fiber optics have enormous capacity for interactive multimedia. Wiring is costly, but telephone and cable companies are expanding their networks rapidly. Advanced services are possible without "fiberizing" each home or classroom.

Computers and video games engage the child as a dynamic participant in learning experiences; their storage capacity and flexibility equip them to serve a wide range of learners. Equitable availability, however, will be a concern for quite some time.

TECHNOLOGY WORKING GROUP

GUIDING PRINCIPLES

In order to ensure universal, affordable access to the broadest range of ready to learn programming, all existing and emerging technologies should be encouraged.

As television, telephone and computer technologies meet, forming a single, comprehensive information conduit to homes and schools, there is a narrow window of opportunity to rethink public service obligations to children and mandate equivalent service from all delivery technologies.

Direct service providers to children should be rewarded financially for technological interconnection. Community-wide communication about resources and methods for service to children is to everyone's benefit. Low- or no-cost opportunities for training will enhance growth of such efforts.

Industry commitment to interoperability of new technologies, without government intervention, should be encouraged. Competition in research and development is important to preserve; however, simplicity and uniformity in receiving equipment is necessary to keep costs to consumers low.

Navigational tools, to help families find ready to learn programming and services appropriate to their needs, are as important to develop as delivery technologies.

R REGULATORY WORKING GROUP

OBJECTIVE

To develop specific recommendations for potential policy approaches that the Federal Communications Commission could consider as possible methods of improving the effectiveness of the Commission's efforts to promote the distribution of more and higher quality ready to learn programming.

BACKGROUND

Media regulation can take many forms. It may mandate or restrict services; it can offer incentives or levy penalties; it can level a playing field to enhance competition. Regulation can't demand quality, but it can create an environment where excellence is prized and rewarded.

Efforts to regulate children's television have perpetually been met by stridently differing interpretations of the government's need and authority to do so. Activist groups urge Congress and the Federal Communications Commission to impose basic obligations for meeting children's developmental and educational needs. Telecasters counter that the First Amendment and fundamentals of the American economic system limit the government's right to intervene in program selection.

With the introduction of new technologies, and the convergence of various media, Congress and the Federal Communications Commission will face new challenges along familiar themes. How can information service to children be guaranteed without infringing on the freedom of expression prized by service providers? How can we ensure that everyone has access to educational technologies, not just the wealthy? How will public service telecommunications be paid for?

REGULATORY WORKING GROUP ---

GUIDING PRINCIPLES

Public policy should seek to ensure that children at home, school and day care have access to quality educational children's programming across all technologies. It is recognized that different policy approaches may be appropriate for different electronic media.

Public policy should encourage all electronic media to provide programming, public service announcements and outreach materials that help parents, teachers, and caregivers to prepare children to enter school ready to learn.

Public policy should seek to provide incentives for all electronic media to produce/distribute ready to learn educational children's programming.

Public policy should ensure funding for an ongoing "ready to learn" service on public broadcasting. Public policy also should ensure ongoing funding for public broadcasting.

INCENTIVES WORKING GROUP

OBJECTIVE

To identify and propose private and public sector incentives associated with development, production, distribution and sponsorship of ready to learn television programming and the expansion of consumer demand for ready to learn programming.

BACKGROUND

Generating high-quality, educational children's television is expensive. Because the target audience is not a viable commercial market, pre-school programming has not, traditionally, enjoyed success in attracting advertising support or corporate underwriting.

Obviously, some projects do get funded; however, there is no apparent model for success. The most enduring and popular children's series are supported—in varying combinations—by foundations, corporate underwriting, government grants, public broadcasting funds, commercial advertising, sales of program-related merchandise and telecasters' largesse.

The need to reduce the Federal deficit ensures that, for the foreseeable future, government funds for educational media will be extremely limited. The National Endowment for Children's Educational Television and the funds allocated to the Department of Education for ready to learn technology are, at present, a small percentage of what is needed to create the range of materials necessary to promote

school readiness, or to provide an ongoing service for children of school age.

Australia may offer an instructive model, in which the government primes the pump. The Australian Children's Television Foundation invests government and private money in productions, leveraging and recouping its stake through program and ancillary material sales. Private contribution to the Foundation is made attractive through tax incentives.

I NCENTIVES WORKING GROUP

GUIDING PRINCIPLES

Supply of ready to learn programming will respond to demand: materials must be conceived and distributed in a context that gives the public strong incentive to use them. Widespread, targeted and coordinated outreach and promotion are vital to generating viable audiences.

Corporations will be influenced to finance ready to learn services if responsibility is shared with government. Efforts to match public funds with private grants would be enhanced by tax incentives for investing in children's programming, outreach materials and services.

Parents—especially young parents and those with few other resources — need inducement to take advantage of supportive resources. Materials should be accessible even before a child's birth, and there should be consistent "branding" of ready to learn programs and materials, to make them familiar and obvious to parents.

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